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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF HAWAII

- - -

KERRY SHANNON,  
  
Plaintiff,  
  
vs.  
  
CITY AND COUNTY OF HONOLULU;  
HONOLULU LIQUOR COMMISSION;  
JOHN SPIERLING; in his  
official capacity as chairman  
of the Honolulu Liquor  
Commission; WALLACE W.  
WEATHERWAX, individually and  
in his capacity as an agent  
and employee of the Honolulu  
Liquor Commission; JOHN  
CARROLL, individually and in  
his capacity as an employee  
of the Honolulu Liquor  
Commission; ANNA HIRAI,  
individually and in her  
capacity as an employee of  
the Honolulu Liquor  
Commission; ALLAN GAYLORD,  
individually and in his  
capacity as an employee of  
the Honolulu Liquor  
Commission; JOHN DOES 1-10,  
JANE DOES 1-10; DOE  
CORPORATIONS 1-10; DOE  
PARTNERSHIPS 1-10; DOE  
GOVERNMENTAL AGENCIES 1-10,  
  
Defendants.

CIVIL NO. CV04-00086  
SPK/LEK

DEPOSITION OF  
ROBERT SHANNON  
SEATTLE, WASHINGTON  
MAY 22, 2006

**CERTIFIED COPY**

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FILE NO.: A0041D7

1 of January.

2 Q. And did your father tell you anything about  
3 what was happening at work at that time?

4 A. Yeah.

5 Q. What did he tell you?

6 A. Just that he was getting harassed at work by  
7 his bosses, and he -- he was thinking about moving to  
8 Washington. He just wanted to get out of there. He felt his  
9 life was getting threatened.

10 Q. Had he told you -- well, strike that.

11 Had he told you about any of this before you  
12 returned home for the Christmas break?

13 A. Yes.

14 Q. Okay. When is the first time he told you about  
15 any of this?

16 MR. POTTS: About any sort of harassment at work?

17 MR. YAMAMOTO: Yes.

18 A. Well, it was -- it was before I even left for  
19 college. I was still a senior at Saint Louis, so -- but I  
20 don't remember the exact times or anything. It was when this  
21 whole trial thing started, you know, with the liquor  
22 commission guys getting caught. That's when -- I think that's  
23 when it all started. I don't remember exactly.

24 Q. Do you remember if it was the end of 2001 or  
25 beginning of 2002, because that was your senior year, right?

1           A.    Yeah.  I believe it was the beginning of 2002,  
2 because our Mustang got stolen, I think it was either in  
3 January of 2002 or December of 2001.

4           Q.    Can you tell me the make of that -- I'm sorry.  
5 Can you tell me the year of that Mustang?

6           A.    '88.

7           Q.    And what type of Mustang was it?

8           A.    It was a Mustang LX 5.0.

9           Q.    Where was it stolen from?

10          A.    From my dad's work on - what was it - Kapiolani  
11 or whatever, one of those side streets wherever he parked.

12          Q.    Do you know if your father parked in the  
13 building parking lot or if he parked on the street?

14          A.    I think he parked on the street.

15          Q.    Did --

16          A.    I --

17          Q.    Oh, go ahead.

18          A.    I think they all parked on the street.

19          Q.    Do you know which street he parked on?

20          A.    I don't remember the street names.

21          Q.    And did they ever find out who stole it?

22          A.    Not that I know of.

23          Q.    Was the car recovered?

24          A.    Yes, it was.

25          Q.    And where was it recovered at?

REPORTER'S CERTIFICATE

I, TYAN L. LUCAS, CCR No. 1971, Certified Shorthand Reporter, certify;

That the foregoing proceedings were taken before me at the time and place therein set forth, at which time the witness was put under oath by me;

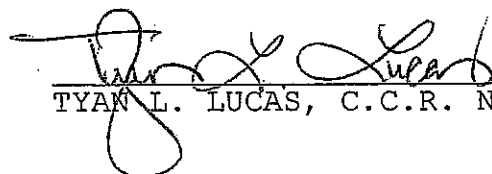
That the testimony of the witness, the questions propounded, and all objections and statements made at the time of the examination were recorded stenographically by me and were thereafter transcribed;

That the foregoing is a true and correct transcript of my shorthand notes so taken.

I further certify that I am not a relative or employee of any attorney of the parties, nor financially interested in the action.

I declare under penalty of perjury under the laws of Washington that the foregoing is true and correct.

Dated this 1st day of June, 2006.

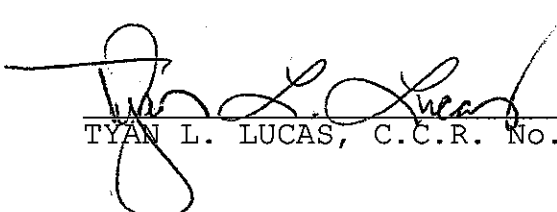
  
TYAN L. LUCAS, C.C.R. No. 1971

1 REPORTER'S CERTIFICATION OF CERTIFIED COPY

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4 I, TYAN L. LUCAS, CCR No. 1971, a Certified  
5 Shorthand Reporter in the State of Washington, certify that  
6 the foregoing pages 1 through 64, constitute a true and  
7 correct copy of the original deposition of ROBERT SHANNON  
8 taken on May 22, 2006.

9 I declare under penalty of perjury under the laws of  
10 the State of Washington that the foregoing is true and  
11 correct.  
12

13 Dated this 1st day of June, 2006.

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17 TYAN L. LUCAS, C.C.R. No. 1971  
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